

**OUTTEN & GOLDEN LLP**

Rachel Bien  
Juno Turner  
Michael N. Litrownik  
3 Park Avenue, 29<sup>th</sup> Floor  
New York, New York 10016  
Telephone: 212-245-1000

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

LAUREN BALLINGER and MATTHEW  
LEIB, on behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

ADVANCE MAGAZINE PUBLISHERS, INC.  
d/b/a/ CONDÉ NAST PUBLICATIONS,

Defendant.

**Case No. 13 Civ. 4036 (HP)**

**NOTICE OF PLAINTIFFS' MOTION FOR CERTIFICATION OF THE  
SETTLEMENT CLASS, FINAL APPROVAL OF THE CLASS ACTION  
SETTLEMENT, AND APPROVAL OF THE FLSA SETTLEMENT**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Certification of the Settlement Class, Final Approval of the Class Action Settlement, and Approval of FLSA Settlement ("Plaintiffs' Motion for Final Approval"), in the Declaration of Rachel Bien in Support of Plaintiffs' Motion for Certification of the Settlement Class, Final Approval of Class Action Settlement, and Approval of the FLSA Settlement, Motion for Approval of Attorneys' Fees and Reimbursement of Expenses, and Motion for Approval of Service Payments ("Bien Decl.") and the supporting exhibits attached thereto, Plaintiffs respectfully request that the Court enter an Order:

- (1) finally certifying the NY Rule 23 Settlement Class, consisting of all individuals who had an Internship in New York State at Condé Nast between June 13, 2007 and December 29, 2014;
- (2) granting final approval of the Settlement Agreement, attached as Exhibit A to the Bien Declaration;
- (3) granting final approval of the FLSA Settlement; and
- (4) granting any other relief that the Court deems just and proper.

\* \* \*

Plaintiffs have contemporaneously submitted a Proposed Order, attached hereto as

**Exhibit A**, for the Court's convenience.

Dated: June 24, 2015  
New York, New York

Respectfully submitted,  
**OUTTEN & GOLDEN LLP**

/s/ Rachel Bien  
Rachel Bien

Rachel Bien  
Juno Turner  
Michael N. Litrownik  
3 Park Avenue, 29th Floor  
New York, New York 10016  
Telephone: (212) 245-1000

*Attorneys for Plaintiffs, the Class, and the Collective*